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IDAHO PUBLIC
UTILITIES COMMISSION



Avista Corp.
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Telephone 509-489-0500
Toll Free 800-727-9170

April 29, 2015

Jean D. Jewell, Secretary
Idaho Public Utilities Commission
P O Box 83720
Boise, ID 83720-0074

Dear Ms. Jewell:

RE: Case No. AVU-E-15-03
Reply Comments and Replacement Tariffs of Avista Corporation

Avista Corporation ("Avista" or "Company") hereby submits reply comments in support of the comments filed by Commission Staff in the above referenced Case.

On April 28, 2015 Commission Staff filed comments related to Avista's Schedule 51 electric line extension tariff filing. In those comments, at page 6, Staff made the following recommendation:

"Staff believes the Company's proposals to be reasonable, and in conformance with Commission Order Nos. 28562 and 33031. Staff recommends that the Company's 2015 Schedule 51 Tariff update costs be adopted, and that the Company retain Section 5.c on pages 51I and J of the current tariff."

The Company supports Staff's recommendation and believes retaining Section 5.c on pages 51I and J of the current tariff is appropriate. Therefore, please find attached revised tariff sheet 51I and 51J which incorporates the agreed-upon changes.

Should you have any questions regarding these comments, please contact Patrick Ehrbar at 509.495.8620 or Joe Miller at 509.495.4546.

Sincerely,

A handwritten signature in black ink, appearing to read "David Meyer", with a horizontal line extending to the right.

David Meyer
Vice President and Chief Counsel for
Regulatory and Governmental Affairs

Enclosures

AVISTA CORPORATION
dba Avista Utilities

SCHEDULE 51 - continued

5. RULES FOR COMMERCIAL AND INDUSTRIAL CUSTOMERS

- a. Both the General Rules and the following rules apply to Line Extensions to serve individual Commercial and Industrial Customers.
- b. Single-Phase Extensions: For Customers who may be served at single phase, as determined by the Company, before the start of construction, the Customer must submit a written application for service and pay an extension cost to the Company which is computed as follows:

	Basic Cost
+	Exceptional Costs
-	Allowance
+	Customer-Requested Costs
-	Cost Reductions
-	(one) Design Fee of \$150 (if paid)
+	Share of Previous Extension
<hr/>	
=	extension cost

- 1) All terms are described in Section 3.b. and the Basic Costs are set forth in Section 7. The amount of the Allowance will be determined individually for each Customer based on the Company's estimate of the Customer's annual energy usage and an allowance per kWh based on the applicable service schedule.
- c. Three-Phase Extensions: For Customers requiring three-phase service, as determined by the Company, before the start of construction, the Customer must submit a written application for service and pay an extension cost to the Company which is computed as follows:

	Total Estimated Extension Cost
-	Allowance
+	Customer-Requested Costs
-	Cost Reductions
-	(one) Design Fee of \$150 (if paid)
+	Share of Previous Extension
<hr/>	
=	extension cost

Issued April 29, 2015

Effective May 18, 2015

Issued by Avista Utilities

By

Kelly Norwood, Vice-President – State & Federal Regulation

Kelly Norwood

AVISTA CORPORATION
dba Avista Utilities

SCHEDULE 51 – continued

- 1) The Total Estimated Extension Cost shall include all costs which are necessary to provide service to the Customer, as determined by the Company. The amount of the Allowance will be determined individually for each Customer based on the Company's estimate of the Customer's annual energy usage and an allowance per kWh based on the applicable service schedule.
- d. When two or more Customers apply concurrently for service from the same Line Extension, each will receive an Allowance up to their proportion of the Total Estimated Extension Cost. Allowances shall be granted only against the costs of the current project and not against any part of an earlier or future extension.

The Allowance will be the Total Estimated Extension Cost, or the applicable Allowance by Schedule multiplied by the Customer's estimated energy usage, whichever is less:

ALLOWANCE BY SERVICE SCHEDULE

Schedule 11 or 12: \$0.12868 per kWh
Schedule 21 or 22: \$0.11874 per kWh
Schedule 31 or 32: \$0.19279 per kWh

Exception: The Company will not grant an immediate Allowance if the Company, in its sole judgement, determines that the load will be in service less than five years.

Undeveloped Commercial and Industrial Lots: A development is a group of neighboring undeveloped lots separated by no more than streets and under the ownership or legal control of a single party as determined by the Company. The General Rules, the Rules for Commercial and Industrial Customers and the following apply to line extensions within commercial or industrial developments. Before Company facilities will be installed, the developer must submit a written application for service and a copy of the plat as approved by the governing agency depicting dedicated utility easements approved by the serving utilities.

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